



County of Lexington

RECEIVED

DEC 16 2008

County Council

212 South Lake Drive, Suite 601

Lexington, South Carolina 29072

TELEPHONE: (803) 785-8103 FAX: (803) 785-8101

BUREAU OF AIR QUALITY

December 12, 2008

James E. Kinard, Jr.
District 1

William C. Derrick
District 2
Chairman

George H. Davis
District 3

Debra B. Summers
District 4
Vice Chairman

Bobby C. Keisler
District 5

Johnny W. Jeffcoat
District 6

John W. Carrigg, Jr.
District 7
Parliamentarian

William B. Banning, Sr.
District 8

M. Todd Cullum
District 9

South Carolina Department of DHEC
Air Planning & Assessment-Bureau of Air Quality
Attn: L. Nelson Roberts
2600 Bull Street
Columbia, South Carolina 29201

Re: Non-attainment Boundary Recommendations

Dear Mr. Roberts:

This letter is in response to the Bureau of Air Quality's request for comments on the 2008 Ground Level Ozone Non-attainment Boundary.

Lexington County recommends that the non-attainment boundary follow the 2000 Columbia Area Transportation Study (COATS) area, excluding areas in Southwest Kershaw County and Northwest Calhoun County. A map displaying this area is enclosed with this letter. They recommended area is the most logical, because it meets a majority of the criteria used by the Environmental Protection Agency (EPA) in 1997 to determine boundaries along with the added criteria that the South Carolina Department of Health and Environmental Control (DHEC) will use.

The area recommended by the County includes all of the monitoring stations that currently exceed the 2008 ground level ozone standard. These monitoring stations are representative of air quality in the Central Midlands Region. This area holds the majority of the population and the highest concentration of major employers within the Central Midlands. Vehicle emissions associated with commuter routes and traffic congestion are largely associated with high population and employment densities. This boundary would ensure that prescriptive measures implemented as a result of non-attainment would focus on an area that has a large influence on air pollution within the Central Midlands.

The recommended area follows the boundary of the 2000 COATS areas with the exception of Southwest Kershaw and Northwest Calhoun Counties. The 2000 COATS area is based on 2000 census density plus growth. The COATS area was

developed with the combined efforts of the Central Midlands Council of Governments (CMCOG) and local jurisdictions. The area includes growth projections for Lexington County out to 2035. These projections were created with input from all municipalities with Lexington County. Growth projections were not included in the 1990 COATS area that was used as the basis for the 1997 ground level ozone non-attainment boundary. By including areas within Lexington County that are expected to experience growth, the non-attainment boundary area will be extended into the Towns of Gilbert and Gaston. This creates a targeted non-attainment boundary around areas that will have the greatest impact on air quality in the County.

Lexington County worked diligently under the Early Action Compact for the 1997 Ozone Standard to ensure that measures aimed at improving air quality were implemented countywide. The County's outdoor burn ordinance covers all areas of the County and air quality educational efforts, such as the Lawn Mower Exchange, were promoted to individuals throughout the County. Although the recommended boundary area does not cover all of Lexington County, any policies or ordinances adopted will continue to be implemented countywide. Lexington County will continue to work closely with DHEC, Richland County, the City of Columbia, the CMCOG, neighboring counties, and other public and private entities within the Central Midlands to advocate the importance of air quality and develop programs and strategies aimed toward improving air quality.

Lexington County is ready to face the task of meeting the 2008 ground level ozone standard. The recommended non-attainment boundary focuses prescriptive measures in the areas having the greatest impact on air quality. By continuing to work with stakeholders and implement programs and ordinances countywide, all areas of the County will receive the same level of service in order to achieve an all-inclusive approach toward meeting the 2008 ozone standard.

If you have any questions, please do not hesitate to contact me at (803) 785-8103.

Sincerely,



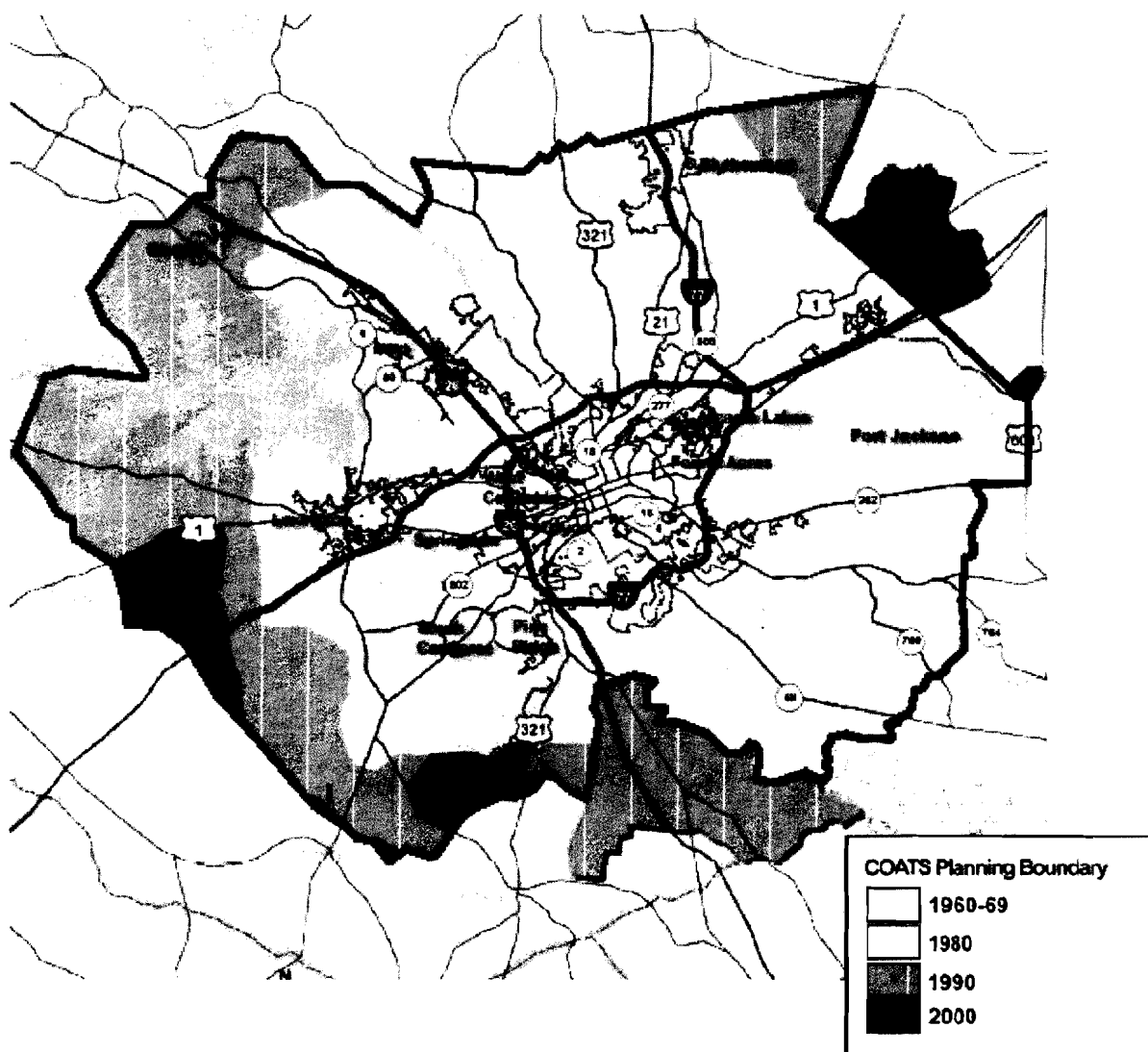
William C. Derrick
Chairman
Lexington County Council

WCD/dwb

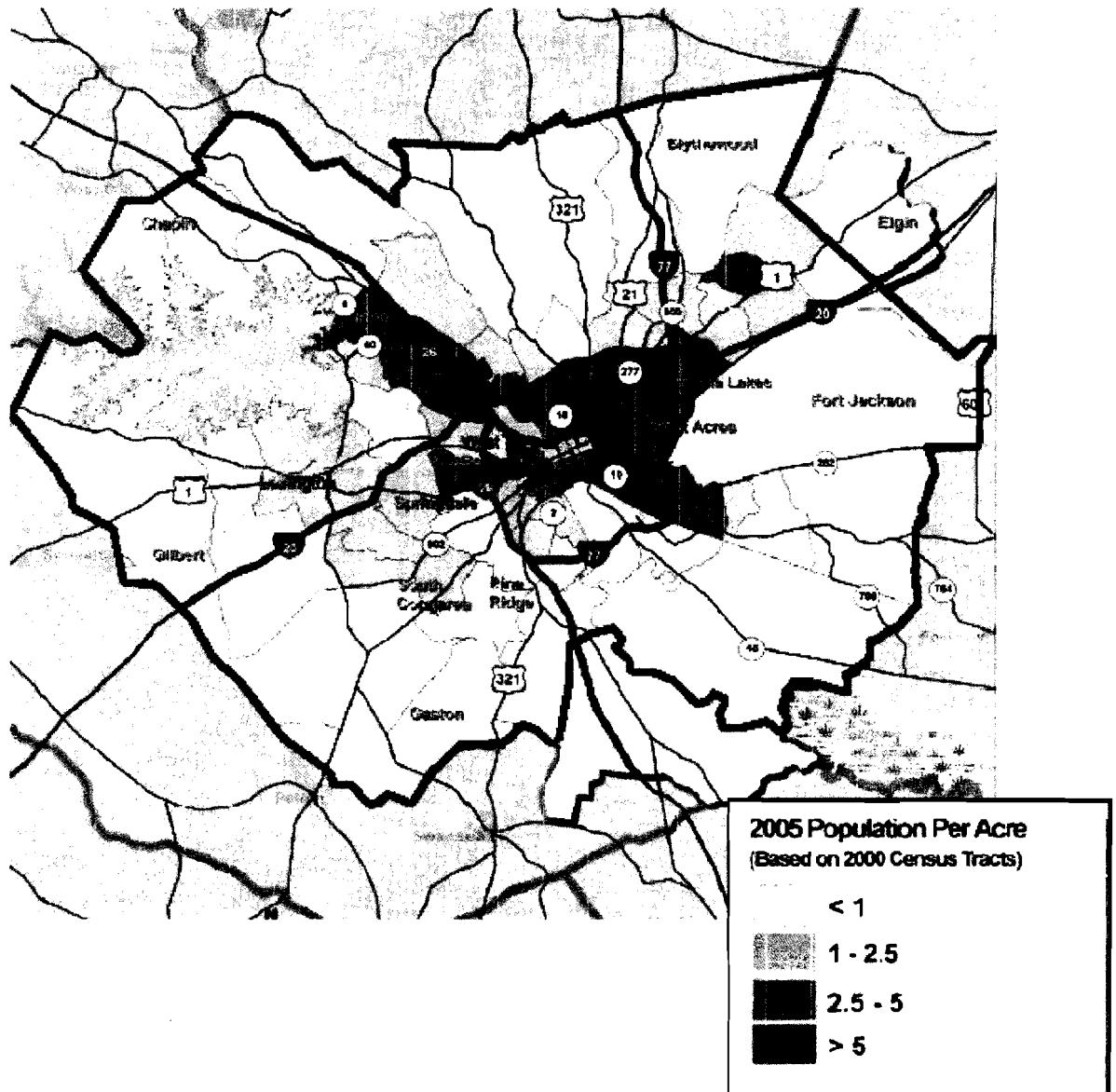
Encl: Lexington County recommended non-attainment area map

cc: Synithia Williams, Lexington County Environmental Coordinator
File

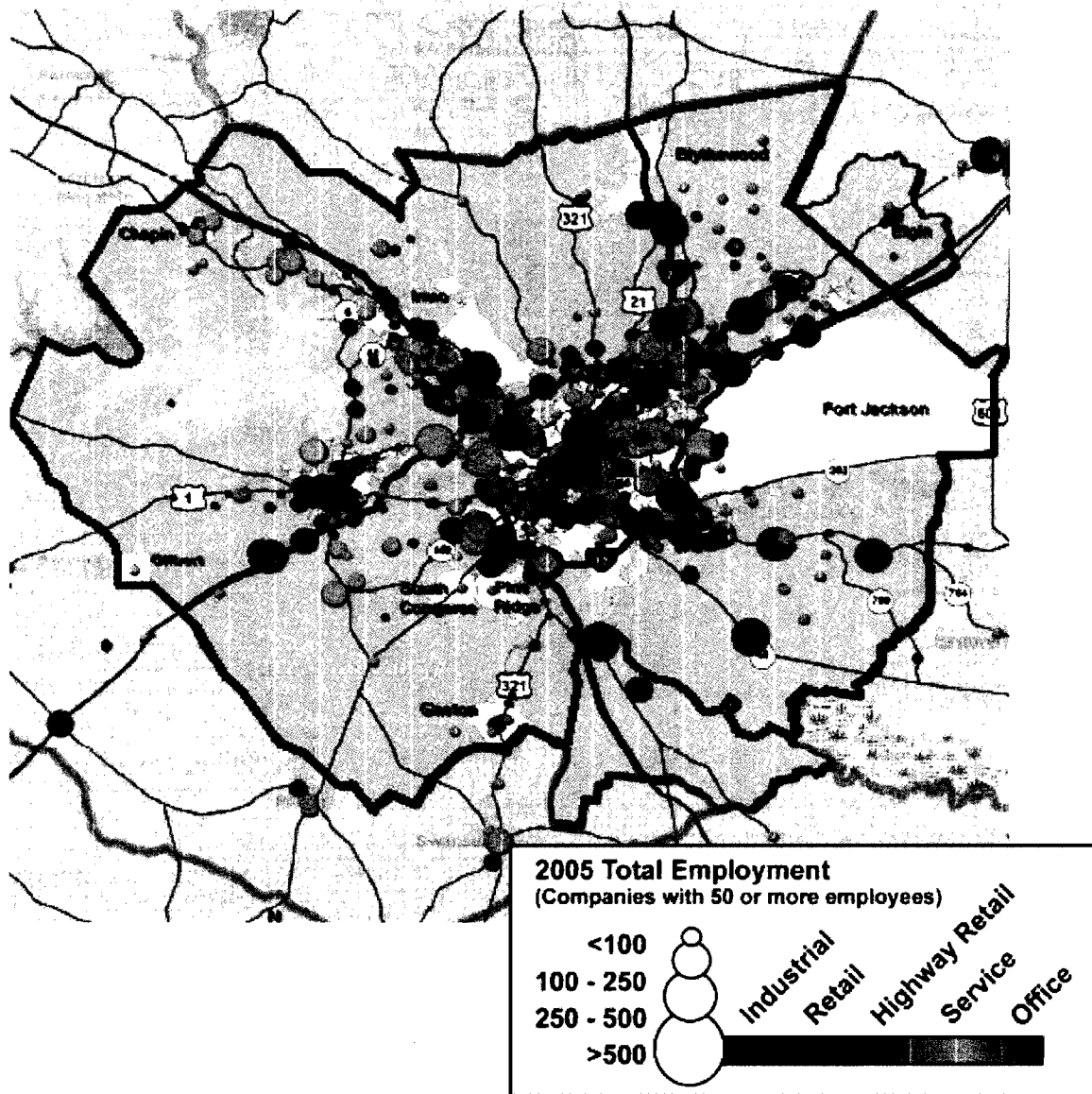
RECOMMENDED CENTRAL MIDLANDS NON-ATTAINMENT BOUNDARY AREA



Recommended non-attainment boundary area based on the 2000 COATS area (blue border) excluding Southwest Kershaw County and Northwest Calhoun County.



CMCOG Map demonstrating population density within recommended non-attainment boundary area.



CMCOG map demonstrating highest majority of major employees in the Central Midlands are located within the recommended non-attainment boundary area.